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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.
ROBERT ALLEN POOLEY,

Defendant.

CASE NO. 2:21-cr-00111-WBS

UNITED STATES' SUPPLEMENT TO
RESTITUTION HEARING BRIEF

DATE: November 12, 2024
TIME: 10:00 a.m.
COURT: Hon. William B. Shubb

The United States respectfully submits the following supplement to its restitution brief in order to also seek restitution for the family of one of Pooley's victims, Carlos Obaid, who is now deceased. The United States was recently able to make contact with Mr. Obaid's family and find an appropriate next-of-kin to whom restitution may be made. *See* 18 U.S.C. § 3663A (a)(2) (In the case of a victim who is ... deceased, the legal guardian of the victim or representative of the victim's estate, another family member, or any other person appointed as suitable by the court, may assume the victim's rights under this section).

This additional restitution request is submitted on behalf of Carlos Obaid Vitar, who is Mr. Obaid's father. The basis for the restitution request is as follows: Carlos Obaid also took the unauthorized Tandem Instructor course that Pooley taught in June or July of 2016. (Exhibit D-1). He paid Pooley \$1,600 in cash for the course. (*Id.*) His presence at the course was verified by two testifying

witnesses at trial: Fabricio Palomino (Exhibit D-2) and Fabian Munoz (Exhibit D-3). Mr. Munoz also verified that Mr. Obaid has since passed away.

In total, Pooley should pay \$1,600 in restitution to Mr. Obaid's father, Carlos Obaid Vitar. This brings the total restitution requested to \$32,684. An updated summary table is as follows:

	Victim	Fees for Course	Travel	Lost Income	Other Expenses	Total
a.	Palomino	\$1,100	\$234	\$2,400	\$2,400	\$6,134
b.	Munoz	\$2,500	\$1,350	\$20,000		\$23,850
c.	North	\$1,100				\$1,100
d.	Obaid	\$1,600				\$1,600
					Total	\$32,684

Dated: November 4, 2024

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By: /s/ DHRUV M. SHARMA
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